

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

FILED

JAN 04 2022

**U.S. CLERK'S OFFICE
INDIANAPOLIS, INDIANA**

THE UNITED STATES OF AMERICA,

Plaintiff,

V.

KEITH MARTIN,
EDWIN SIMS, and
JAMES ALEXANDER,

Defendants.

CAUSE NO.

-01 1 : 2 2 -cr- 0 0 0 5 JRS -DML
-02
-03

INDICTMENT

The Grand Jury charges that:

COUNT 1
18 U.S.C. § 2113(b)
Bank Theft

On or about November 16, 2021, in the Southern District of Indiana, the Defendants, KEITH MARTIN, EDWIN SIMS and JAMES ALEXANDER, did take and carry away with the intent to steal approximately \$204,918 of money, belonging to and in the care, custody, control and management and possession of PNC Bank, and/or JP Morgan Chase Bank, and/or Fifth Third Bank, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Sections 2113(b) and 2.

FORFEITURE

1. Pursuant to Federal Rule of Criminal Procedure 32.2, the United States hereby gives the defendant notice that the United States will seek forfeiture of property, criminally and/or civilly, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), as part of any sentence imposed.

2. Pursuant to Title 18, United States Code, Section 924(d), if convicted of the offenses set forth in Count One of this Indictment, the defendants shall forfeit to the United States “any firearm or ammunition involved in” the offenses.

3. The property subject to forfeiture includes, but is not necessarily limited to, the following:

- a. a SAR9 9mm firearm with a serial number T102-20BV58135;
- b. Palmetto AR-15 with a serial number 238693;
- c. Glock 19 9mm firearm with a serial number BUPU956 and,
- d. \$70,840.78 in United States Currency.

4. The United States shall be entitled to forfeiture of substitute property pursuant to, and as incorporated by Title 28, United States Code, Section 2461(c), if any of the property described above in paragraph 4, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;


- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;

A TRUE BILL:


FOREPERSON

ZACHARY A. MYERS
United States Attorney

By:


Peter A. Blackett
Assistant United States Attorney